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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA  
 MUNIZ, ELIZA CAMBAY, SAL  
 CATALDO, EMIR GOENAGA, JULIAN  
 SANTIAGO, HAROLD NYANJOM,  
 KELLIE NYANJOM, and SUSAN LYNN  
 HARVEY, individually and on behalf of all  
 others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688

**DECLARATION OF ALEXANDER P.  
 FRAWLEY IN SUPPORT OF  
 ADMINISTRATIVE MOTION TO SEAL  
 PORTIONS OF OPPOSITION TO  
 GOOGLE'S MOTION TO DISMISS OR  
 STRIKE PORTIONS OF SECOND  
 AMENDED COMPLAINT**

The Honorable Richard Seeborg  
 Courtroom 3 – 17th Floor  
 Date: August 19, 2021  
 Time: 1:30 p.m.

**DECLARATION OF ALEXANDER P. FRAWLEY**

I, Alexander P. Frawley, declare as follows.

1. I am an associate with the law firm of Susman Godfrey L.L.P, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of New York, and admitted *pro hac vice* in this case. (Dkt No. 81). I have personal knowledge of the matters set forth herein and am competent to testify.

2. Pursuant to Civil Local Rule 79-5(e), I submit this Declaration in Support of Plaintiffs' administrative motion to seal portions of the Opposition to Google's Motion to Dismiss or Strike Portions of the Second Amended Complaint (the "Opposition"). The Opposition references material that Google LLC ("Google") has designated as "Confidential" and "Highly Confidential – Attorneys' Eyes Only" under the parties' Protective Order (Dkt No. 70).

3. Plaintiffs respectfully request that the Court seal the redacted portions of the Opposition, attached hereto as Exhibit A.

4. Pursuant to Civil Local Rule 79-5(e)(1), Google, as the designating party, must file a declaration within 4 days establishing that all of the designated material is sealable.

5. I personally served a copy of this Declaration on Google's counsel of record by email on July 16, 2021. A Proof of Service is attached hereto as Exhibit B.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 16th day of July, 2021, at New York, New York.

/s/ Alexander P. Frawley